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Attorneys for Defendant
LG PHILIPS LCD AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Arthur Sorokin, individually and on behalf of
all those similarly situated,

Plaintiff,

vs.

LG-Philips LCD Co. Ltd., LG Philips LCD
America, Inc.; Samsung Electronics Co. Ltd.;
Sharp Corporation; Sharp Electronics
Corporation; Toshiba Corporation; Toshiba
Matsushita Display Technology Co., Ltd.;
Hitachi Ltd.; Hitachi Displays, Ltd.; Hitachi
America Ltd.; Hitachi Electronic Devices
(USA), Inc.; Sanyo Epson Imaging Devices
Corporation; NEC Corporation; NEC LCD
Technologies, Ltd.; NEC Electronics America,
Inc.; IDT International Ltd.; AU Optronics;
International Display Technology Co., Ltd.;
International Display Technology USA Inc.;
AU Optronics Corporation America; Chi Mei
Optoelectronics; Chi Mei Optoelectronics
USA, Inc.; Chunghwa Picture Tubes Ltd.;
Hannstar Display Corporation;

Defendants.

CASE NO. C 06-7600 (WDB)

**STIPULATION FOR EXTENSION OF
TIME**

Honorable Wayne D. Brazil

1 WHEREAS plaintiff filed a complaint in the above-captioned case on or about
2 December 12, 2006;

3 WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid
4 Crystal Display ("LCD") products;

5 WHEREAS more than fifteen complaints have been filed to date in federal district
6 courts throughout the United States by plaintiffs purporting to bringing class actions on behalf of
7 indirect purchasers alleging antitrust violations by manufacturers of LCD products (collectively,
8 "the LCD Cases");

9 WHEREAS there is a motion pending before the Judicial Panel on Multidistrict
10 Litigation to transfer the LCD Cases to the Northern District of California for coordinated or
11 consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

12 WHEREAS plaintiff anticipates the possibility of Consolidated Amended
13 Complaints in the LCD Cases;

14 WHEREAS plaintiff and LG Philips LCD America, Inc. ("LPL America") have
15 agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be
16 more efficient for the parties and for the Court;

17 WHEREAS plaintiff agrees that the deadline for LPL America to respond to the
18 Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after
19 the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after
20 plaintiff provides written notice to LPL America that he does not intend to file a Consolidated
21 Amended Complaint, provided that such notice may be given only after the initial case
22 management conference in the MDL transferee court in this case;

23 WHEREAS plaintiff further agrees that this extension is available, without further
24 stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of
25 their intention to join this extension;

26 WHEREAS this Stipulation does not constitute a waiver by LPL America or any
27 defendant of any defense, including but not limited to the defenses of lack of personal or subject
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1 matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper
2 venue.

3 PLAINTIFF AND DEFENDANT LPL AMERICA, BY AND THROUGH THEIR
4 RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

5 1. The deadline for LPL America to respond to the Complaint shall be
6 extended until the earlier of the following two dates (1) forty-five days after the filing of a
7 Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff
8 provides written notice that he does not intend to file a Consolidated Amended Complaint,
9 provided that such notice may be given only after the initial case management conference in the
10 MDL transferee court in this case.

11 2. This extension is available, without further stipulation with counsel for
12 plaintiff or further order of the Court, to all named defendants who notify plaintiff in writing of
13 their intention to join this extension.

14 IT IS SO STIPULATED.

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16 DATED: January 2, 2007

Respectfully submitted,

MUNGER, TOLLES & OLSON LLP

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19 By: 

JEROME C. ROTH
Attorneys for Defendant
LG PHILLIPS LCD AMERICA, INC.

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22 Of Counsel:

23 Michael R. Lazerwitz
24 Jeremy J. Calsyn
25 Lee F. Berger
26 CLEARLY GOTTLIEB STEEN &
27 HAMILTON LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1999

1 DATED: January 2, 2007

FURTH LEHMANN & GRANT LLP

2
3 By: /s/

4 MICHAEL P. LEHMANN
5 THOMAS P. DOVE
6 CHRISTOPHER L. LEBSOCK
7 JON T. KING
8 Attorneys for Plaintiff
9 ARTHUR SOROKIN

10 PURSUANT TO STIPULATION, IT IS SO
11 ORDERED:

12 Dated: 1/3/2007

/s/ Wayne D. Brazil

13 Magistrate Honorable Wayne D. Brazil
14 Judge of the United States District Court

15 **CERTIFICATION**

16 I, Jerome C. Roth, am the ECF User whose identification and password are being used to
17 file this Stipulation for Extension of Time. In compliance with General Order 45.X.B, I hereby
18 attest that Jon T. King has concurred in this filing.
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